

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES

Docket No. R2001-1

**Major Mailers Association's First Set Of Interrogatories And Document  
Production Requests To USPS Witness Joseph D. Moeller**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, Major Mailers Association herewith submits the following interrogatories and document production requests to USPS witness **Joseph D. Moeller: MMA/USPS-T28-1-2..** If the designated witness is unable to answer any of these questions, please direct them to the appropriate witness who can provide a complete response.

Respectfully submitted,

**Major Mailers Association**

By: 

Michael W. Hall  
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540-554-8880

Counsel for  
**Major Mailers Association**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing discovery request upon the United States Postal Service, the Designated Officer of the Commission, and participants who requested service of all discovery documents, in compliance with the Commission's Rules of Practice.

Dated this 5th day of November, 2001.

  
Michael W. Hall

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**MMA/USPS-T28-1** Please provide, for the Test Year Before Rates, an exhibit similar to Exhibit USPS-28A but with attributable costs using the Commission's cost methodology rather than the Postal Service's proposed cost methodology. Please provide the source for the attributable costs.

**MMA/USPS-T28-2** Please provide, for the Test Year After Rates , an exhibit similar to Exhibit USPS-28B but with attributable costs using the Commission's cost methodology rather than the Postal Service's proposed cost methodology. Please provide the source for the attributable costs.